

## **Exhibit A**

**THE PARTIES' DEPOSITION DESIGNATIONS, CROSS-DESIGNATIONS, AND OBJECTIONS FOR MOORE, BRYAN, CRONIN  
ROBBIO AND MUELLER, TO BE RULED ON BY THE COURT**

For the following depositions, blue highlighting represents Plaintiffs' designations and green highlighting represents Defendants' cross-designations.

**1. Andrew Moore**

Andrew Moore		Plaintiffs' Obj.	Defendants' Response to Plaintiffs' Obj.	Defendants' Obj.	Plaintiffs' Response to Defendants' Obj.	Ruling on Objection
166:25	167:15			Counsel misrepresents the document	Counsel did not misrepresent	Sustained ____ Overruled ____
170:4	170:6	Relevance (MIL); prejudicial	Plaintiffs' designations make the theme that the videos were a smear campaign, so this is needed to rebut..			Sustained ____ Overruled ____
170:9	171:8	Relevance (MIL); prejudicial; .	Plaintiffs' designations make the theme that the videos were a smear campaign, so this is needed to rebut.			Sustained ____ Overruled ____
171:12	171:19	Relevance (MIL); .	Relevant to whether Defendants' intent was to harm Plaintiffs illegally.			Sustained ____ Overruled ____
171:23	172:17	Hearsay (172:4-12).	Relevant to whether Defendants' intent was to harm Plaintiffs illegally. Not hearsay because it goes to motive and intent.			Sustained ____ Overruled ____
219:15	219:18	Relevance	Relevant to motive and intent; needed to clarify witness's testimony sine Plaintiffs included designations on defunding of Planned Parenthood			Sustained ____ Overruled ____
219:21	219:24	Relevance	Relevant to motive and			Sustained ____

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Andrew Moore		Plaintiffs' Obj.	Defendants' Response to Plaintiffs' Obj.	Defendants' Obj.	Plaintiffs' Response to Defendants' Obj.	Ruling on Objection
			intent; needed to clarify witness's testimony sine Plaintiffs included designations on defunding of Planned Parenthood			Overruled____
238:12	238:15	Relevance	Relevant to countering Plaintiffs' theme that damages can include costs of inhibiting First Amendment protected activity.			Sustained ____ Overruled____
244:8	244:22	Hearsay; relevance.	Relevant to whether Defendants' intent was to harm Plaintiffs illegally. Not hearsay because it goes to motive and intent.			Sustained ____ Overruled____

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**2. Phil Cronin**

<b>Phil Cronin</b>		<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
<b>12:3</b>	<b>12:13</b>			Lacks foundation	He discussed taking on this role with Katie Short and is also a lawyer, who knew what an agent for service of process was	Sustained ____ Overruled ____
<b>13:19</b>	<b>14:2</b>	Hearsay (offered for truth)	Not hearsay, offered for motive and intent, and to counter Plaintiffs' narrative that only professional media personnel may engage in investigative journalism; no more objectionable than immediately preceding or succeeding designations			Sustained ____ Overruled ____
<b>14:10</b>	<b>15:6</b>	Relevance (MIL); prejudicial; ; Speculation; Hearsay (offered for the truth)	Relevant to establish motive, intent, and purpose of the investigation			Sustained ____ Overruled ____
<b>15:7</b>	<b>16:3</b>			Lacks foundation (as to 15:14-16:3)	Asked for his understanding based on what he was told.	Sustained ____ Overruled ____
<b>19:1</b>	<b>20:15</b>			Lacks foundation (as to 20:9-15)	Asked for his understanding based on what he was told.	Sustained ____ Overruled ____
<b>20:16</b>	<b>20:19</b>			Lacks foundation	Provided his own understanding.	Sustained ____ Overruled ____
<b>21:2</b>	<b>22:8</b>	Relevance	Relevant to show earnest intent of those involved with the investigation			Sustained ____ Overruled ____

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Phil Cronin		Plaintiffs' Obj.	Defendants' Response to Plaintiffs' Obj.	Defendants' Obj.	Plaintiffs' Response to Defendants' Obj.	Ruling on Objection
25:2	29:23			Relevance; more prejudicial than probative; waste of time (as to 27:4-29:23)	This goes directly to Defendants' fraudulent actions and using Mr. Cronin's name and card without authorization.	Sustained ____ Overruled ____
30:21	31:7			Relevance; more prejudicial than probative; waste of time	This goes directly to Defendants' fraudulent actions and using Mr. Cronin's name and card without authorization.	Sustained ____ Overruled ____

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**3. Kate Bryan**

<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
47:13 – 15	R. 402, 403	Background; Motives.			
47:17 – 19	R. 402, 403	Background; Motives.			
114:20 – 117:10	Relevance; waste of time (116:7-117:10)	Shows the nature of her role regarding CMP and Daleiden. Shows how CMP operated.			Sustained ____ Overruled ____
123:1 – 125:11; 125:17 – 126:10	124:8-17 (Relevance (MIL), prejudicial)	Page 124:8-17 is high level discussion of the investigation, it does not violate the MIL Orders.			Sustained ____ Overruled ____
129:15 – 16	R. 402, 403 (MIL)	Background; Motives; Rebuts argument of recent fabrication			
129:18 – 21	R. 402, 403 (MIL)	Background; Motives; Rebuts argument of recent fabrication.			
140:15 – 144:11	Relevance (MIL) and prejudicial (142:8-142:16); Asked and answered, cumulative, waste of time (143:3-144:11).  Objection to attachments to and press release portions of Ex. 96 (R. 402, 403). Allowing the full exhibit would force the parties to get into the truth or falsity of the videos, which	This goes to her credibility. Also, relevant to defendants' intent proving absence of fraudulent intent, needed for jury to assess reasonableness of defendants' belief that they are journalists and needed to assess damages as non-alteration of videos is a mitigating factor. (Regarding 142:8-142:16, the truth of the videos are not contested). Not asked and answered			Sustained ____ Overruled ____

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<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
	the Court has restricted and found irrelevant.	<p>because subsequent questions are clarifying. Rebutts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.</p> <p>Exhibit 96 is a generic cover letter with press-kit, there is nothing inflammatory within and is highly relevant to showing Defendants' intent and belief that they are journalists. It is needed to assess damages as publication is a defense. Goes to non-alteration of videos as a mitigating factor. (Regarding 142:8-142:16, the truth of the videos are not contested). Rebutts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.</p>			
149:2 – 150:13	<p>No Objection to testimony.</p> <p>Objection to portions</p>	Exhibit 97 is an email regarding publication of the videos, which is highly relevant to			<p>Sustained ____</p> <p>Overruled ____</p>

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<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
	of Ex. 97 (R. 402, 403). This document is not on any parties' exhibit list. It includes mention of law enforcement communications, that potentially indicates results, which the Court has excluded, and discussion that would get into truth or falsity.	showing Defendants' intent. It rebuts the argument that Defendants' claims of going to law enforcement is a recent fabrication. It is further an example of Defendants' journalistic practice and is highly relevant to showing Defendants' intent and belief that they are journalists. It is needed to assess damages as publication is a defense. Goes to non-alteration of videos as a mitigating factor. (Regarding 142:8-142:16, the truth of the videos are not contested). Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			



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<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
<b>155:11 – 157:14</b>	Relevance; Speculation; hearsay (155:16-23, 156:13-157:1)	Plaintiffs' designations make the theme that the videos were a smear campaign. (155:18-23; she is talking about what she said and her industry's custom.) (156:21-157:1; She is not repeating what others said but what she has observed.) Rebutts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled ____
<b>163:6 – 166:5; 166:16-18</b>	Relevance, and waste of time (163:6-165:1); prejudicial (MIL) (164:23-165:1)  No objection to 165:2-166:5 or 166:16-166:18	Shows that Daleiden was the decision maker and driver of the project who did not generally share information. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg.			Sustained ____ Overruled ____
<b>168:9 – 169:14</b>	Relevance (MIL) - her intent is not at issue in the case	Explains why she would work without pay as stated in 106:2-5. Relevant to credibility. Relevant to rebut Plaintiffs' argument that they were targeted.			Sustained ____ Overruled ____

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<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
<b>181:1 – 13</b>	Relevance; waste of time	Shows that Daleiden did not inform all parties of all facts. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg.			Sustained ____ Overruled ____
<b>183:12 – 184:11</b>	Relevance; waste of time	Shows that Daleiden was the decision maker and driver of the project. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg.			Sustained ____ Overruled ____
<b>185:9 – 187:5</b>	Relevance; waste of time	Shows that Daleiden did not inform all parties of all facts. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg.			Sustained ____ Overruled ____
<b>187:19 – 188:4</b>	Relevance; waste of time	Shows that Daleiden did not inform all parties of all facts. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin			Sustained ____ Overruled ____

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<b>Kate Bryan</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
		Rhomberg.			
190:17 – 20	Relevance; waste of time	Shows that Daleiden did not inform all parties of all facts. Relevant to show control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg.			Sustained ____ Overruled ____
249:4 – 10	No objection.  Objection to Ex. 106 (pg 7) under R. 402 (MIL), 403	Pages 7 through 10 may be omitted.			
249:24 – 250:9	250:4-9 is an unanswered question	Question continues at 250:18; attorney colloquy is merely omitted			Sustained ____ Overruled ____
252:21 – 25	Objection to exhibit 107 (pg 13-15, 17-20 under R. 402, 403 (MIL)).	The pages objected to, pages 13–15 and 17–20, may be omitted.			

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**4. Peter Robbio**

<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
50:20 – 22			Relevance, Waste of time, Prejudicial.	Witness is discussing his job history; relevant to Defendants' motivations in choosing partners	Sustained ____ Overruled ____
67:22 – 68:25	relevance (MIL); prejudice;	Relevant to Defendants' motivations. Rebuts Plaintiffs' argument that the videos were released with malicious or fraudulent intent as they are full videos. Rebuts implication that videos were misleadingly edited. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24. Plaintiffs' designations make the theme that the videos were a smear campaign, so this is not outside the scope of the designation. In any event, this could be part of Defendants' direct because the Court is "not inclined to separate out the depositions. . . .			Sustained ____ Overruled ____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
		Having the video twice [] is just a mistake." Trial Transcript at 382. (Hereafter: Could be used in direct.)			
70:23 – 72:1	relevance (MIL); prejudice; .	Relevant to Defendants' motivations. Rebuts Plaintiffs' argument that the videos were released with malicious or fraudulent intent as they are full videos. Rebuts implication that videos were misleadingly edited. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24. Could be used in direct.			Sustained ____ Overruled ____
80:9 – 16			Relevance, Prejudicial, Waste of time.	Relevant to Defendants' intent and to rebut Defendants' argument that releasing full videos evidenced their intent. No content discussed.	Sustained ____ Overruled ____
81:4 – 81:24			Relevance, Prejudicial, Waste of time.	Relevant to Defendants' intent and to rebut Defendants' argument that releasing full videos evidenced their intent. No content discussed.	Sustained ____ Overruled ____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
83:13 – 25			Relevance, Prejudicial, Waste of time.	Relevant to Defendants' intent and to rebut Defendants' argument that releasing full videos evidenced their intent. No content discussed.	Sustained ____ Overruled ____
90:15 – 25	Speculation; legal conclusion; relevance	Robbio knows what he understood and so this is not speculation. Offered to show why he publicized the videos and that defendants' did not lie to him about the videos. The proper remedy is a limiting instruction and not exclusion.			Sustained ____ Overruled ____
92:11 – 21; 93:21 – 24	Relevance	Relevant to show that not control, involvement and knowledge or lack thereof regarding Troy Newman and Albin Rhomberg by showing that not all documents were shared with all involved.			Sustained ____ Overruled ____
99:1 – 11	Relevance	Clarifies the answers of Plaintiffs' designation of 98:14-16. Relevant to Defendants' intent and shows the strategies taken.			Sustained ____ Overruled ____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
99:12 – 100:3	Relevance	Clarifies the answers of Plaintiffs' designation of 98:14-16. Relevant to Defendants' intent and shows the strategies taken.			Sustained ____ Overruled ____
100:14 – 101:18			Relevance, Prejudicial, Waste of time, Opinion, Calls for Speculation	Not speculation as it asks for what was said; defendants' goals are relevant	Sustained ____ Overruled ____
104:2 – 5			Relevance, Prejudicial, Waste of time, Opinion, Calls for Speculation	Not speculation as it asks for what was said; defendants' pro-life agenda is relevant	Sustained ____ Overruled ____
104:8 – 10			Relevance, Prejudicial, Waste of time, Opinion, Calls for Speculation	Not speculation as it asks for what was said; defendants' pro-life agenda is relevant	Sustained ____ Overruled ____
110:11 – 111:13	Speculation; Relevance (MIL); prejudice; .	Relevant to Defendants' intent and shows the strategies taken. Shows the nature of defendants' pro-life agenda.			Sustained ____ Overruled ____
112:18 – 113:10	Speculation; Relevance (MIL); prejudice; .	Relevant to Defendants' intent and shows the strategies taken. Shows the nature of defendants' pro-life agenda.			Sustained ____ Overruled ____
114:5 – 115:5	Speculation; Relevance (MIL); prejudice; .	Relevant to Defendants' intent and shows the strategies taken. Shows the nature of defendants' pro-life			Sustained ____ Overruled ____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
		agenda. Rebuts Plaintiffs' argument that the videos were released with malicious or fraudulent intent by showing how they were released. Shows why the videos were publicized. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			
151:8 – 152:14	Relevance; no context/incomplete	Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			
153:2 – 4			Relevance, Opinion, Personal Knowledge		Sustained ____ Overruled ____
165:9 – 166:14	Object to portions of underlying Ex. 309 (R. 402, 403 - MILs)	Shows the strategies taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled ____
168:5 – 169:12	Relevance (MIL);	Shows the strategies			Sustained ____



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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
	prejudice; .	taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Overruled____
169:23 – 170:23	Relevance (MIL); prejudice; .	Shows the strategies taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled____
172:18 – 174:3	Relevance (MIL); prejudice; .	Shows the strategies taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
180:4 – 181:23	Relevance (MIL); prejudice; .	Shows the strategies taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Relevant to Defendants' intent and goals. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled ____
182:9 – 183:4	Relevance (MIL); prejudice; .	Shows the strategies taken by defendants'. Shows the nature of defendants' pro-life agenda. Shows how the videos were publicized. Relevant to Defendants' intent and goals.			Sustained ____ Overruled ____
218:8 – 12			Relevance – regards time after publication.	Goes to Defendants' intent and motives	Sustained ____ Overruled ____
219:8 – 17			Relevance – regards time after publication, Hearsay, Personal Knowledge	Goes to Defendants' intent and motives	Sustained ____ Overruled ____
226:11 – 14			Relevance – regards time after publication, Prejudicial, Waste of time, Calls for Speculation.	Goes to Defendants' intent and motives	Sustained ____ Overruled ____
227:6 – 227:13	Relevance; prejudicial	Goes to Defendants' intent and motives.			Sustained ____ Overruled ____

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<b>Peter Robbio</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
		Shows the strategies taken by defendants'			

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**5. Greg Mueller**

<b>Greg Mueller</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
15:14 – 21			Relevance. Prejudice. Inflammatory.	Provides company background and goes to Defendants' intent in using them	Sustained ____ Overruled ____
16:8 – 13			Relevance. Prejudice. Inflammatory.	Provides company background and goes to Defendants' intent in using them	Sustained ____ Overruled ____
42:8 – 21			Relevance	Goes to intent and motives	Sustained ____ Overruled ____
108:4 – 25	R. 402, 403 (108:4-8)	Shows good faith of reasonable belief that crimes were being committed. Rebuts argument of recent fabrication. Rebuts argument that videos were misleadingly edited. Rebuts malicious intent.			
116:6 – 8	Relevance (MIL); Speculation; Outside the scope of Plaintiffs' designations	Goes to Defendants' intent and motives. Shows the strategies taken by defendants' Could be used in direct.			Sustained ____ Overruled ____

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<b>Greg Mueller</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
116:11 – 17	Relevance (MIL); Speculation; Outside the scope of Plaintiffs' designations	Goes to Defendants' intent and motives. Shows the strategies taken by defendants' Could be used in direct.			Sustained ____ Overruled ____
132:24 – 135:6			135:1 – 6: Relevance	Goes to motive/intent	Sustained ____ Overruled ____
136:3 – 6			Relevance	Goes to motive/intent	Sustained ____ Overruled ____
136:11 – 17			Relevance	Goes to motive/intent	Sustained ____ Overruled ____
146:25 – 23			Relevance	Goes to motive/intent	Sustained ____ Overruled ____
148:6 – 15			Hearsay	Not offered for truth; present sense impression	Sustained ____ Overruled ____
157:17 – 19			Relevance. Waste of time		Sustained ____ Overruled ____
166:6 – 8	Relevance (MIL); outside the scope of designations	Goes to Defendants' intent and motives. Shows the strategies taken by defendants'. Could be used in direct.			Sustained ____ Overruled ____
166:11 – 23	Relevance (MIL); outside the scope of designations	Goes to Defendants' intent and motives. Shows the strategies taken by defendants. Could be used in direct. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled ____
167:11-167:19			No objection if 166:11-	Counter-designation	

**THE PARTIES' DEPOSITION DESIGNATIONS, CROSS-DESIGNATIONS, AND OBJECTIONS FOR MOORE, BRYAN, CRONIN  
ROBBIO AND MUELLER, TO BE RULED ON BY THE COURT**

<b>Greg Mueller</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
			23 is accepted	to 166:11-25 added for completeness if that portion is allowed	
172:6-14; 172:17-174:4	Speculation; Relevance; prejudicial; outside the scope of designations	Goes to Defendants' intent and motives. Shows the strategies taken by defendants'. He is testifying about his industry custom. Could be used in direct. Rebuts testimony that videos are "misleading" or improperly edited. See, Trial Tr., 10-3-19, 363:9-11; 10-10-19, 933:21-24, 952:13-24.			Sustained ____ Overruled ____
262:25-263:1			Relevance	Background; motives; bias	Sustained ____ Overruled ____
263:14 – 21			Relevance	Background; motives; bias	Sustained ____ Overruled ____
263:22 – 264:12			Relevance	Background; motives; bias	Sustained ____ Overruled ____
265:7 – 16			Relevance. Prejudice. Waste of time. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
265:17 – 266:3			Relevance. Prejudice. Waste of time. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
266:9 – 16			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character	Background; motives; bias	Sustained ____ Overruled ____

**THE PARTIES' DEPOSITION DESIGNATIONS, CROSS-DESIGNATIONS, AND OBJECTIONS FOR MOORE, BRYAN, CRONIN  
ROBBIO AND MUELLER, TO BE RULED ON BY THE COURT**

<b>Greg Mueller</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
			Evidence.		
267:4 – 268:9			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
269:7 – 12			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
270:24 – 272:6			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
272:16 – 273:14			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
274:8 – 13			Relevance. Prejudice. Waste of time. Inflammatory. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
277:9 – 12			Relevance. Opinion. Hearsay. Inflammatory. Personal knowledge. Opinion. Incomplete, should continue to 277:12	Background; motives; bias	Sustained ____ Overruled ____
277:17 – 20			Relevance. Prejudice. Waste of time. Hearsay. Opinion.	Background; motives; bias	Sustained ____ Overruled ____

**THE PARTIES' DEPOSITION DESIGNATIONS, CROSS-DESIGNATIONS, AND OBJECTIONS FOR MOORE, BRYAN, CRONIN  
ROBBIO AND MUELLER, TO BE RULED ON BY THE COURT**

<b>Greg Mueller</b>	<b>Plaintiffs' Obj.</b>	<b>Defendants' Response to Plaintiffs' Obj.</b>	<b>Defendants' Obj.</b>	<b>Plaintiffs' Response to Defendants' Obj.</b>	<b>Ruling on Objection</b>
			Inflammatory.		
277:22 – 278:5			Relevance. Prejudice. Waste of time. Hearsay. Personal knowledge. Opinion.	Background; motives; bias	Sustained ____ Overruled ____
278:13 – 25			Relevance. Prejudice. Waste of time. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
279:2 – 14			Relevance. Prejudice. Waste of time. Improper Character Evidence.	Background; motives; bias	Sustained ____ Overruled ____
280:20 – 22			Hearsay. Relevance. Prejudice. Waste of time.	Background; motives; bias	Sustained ____ Overruled ____
281:1 – 4			Hearsay. Relevance. Prejudice. Personal knowledge.	Background; motives; bias	Sustained ____ Overruled ____
281:5 – 23			Relevance. Prejudice. Waste of time. Personal knowledge. Hearsay. Opinion.	Background; motives; bias	Sustained ____ Overruled ____